R01-20-C-002

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

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November 18, 2019

Ms. Susan Sweitzer
Senior Project Manager
Norwalk Redevelopment Agency
3 Belden Ave., 2nd floor
Norwalk, CT 06850

Re: State Acknowledgement Letter for EPA Brownfields Cleanup Grant for FY 20

Dear Ms. Sweitzer:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Norwalk Redevelopment Agency intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2020. The Norwalk Redevelopment Agency plans to use the grant funding to clean up hazardous substances at the South Norwalk railroad station at 30 Monroe Street in Norwalk.

Cleanup work funded by an EPA grant must be performed in one of Connecticut's formal remediation programs, including among others the Voluntary Remediation Program pursuant to CGS § 22a-133x, the Property Transfer Program, (if applicable) pursuant to CGS §22a-134, the Urban Sites Remedial Action Program pursuant to CGS §22a-133m, or the Brownfields Remediation and Revitalization Program pursuant to CGS §32-769.

You may want to refer to DEEP's PREPARED Municipal Workbook. This on- line guidebook is designed to help municipalities navigate the complex process of remediating and redeveloping brownfields. The Workbook is available on DEEP's web site at http://www.ct.gov/deep/cwp/view.asp?a=2715&q=555770&deepNav_GID=1626.

If you have any questions about this letter, please contact me at (860) 424-3768 or by e-mail at mark.lewis@ct.gov. Good luck with your application.

Sincerely,

Mark R. Lewis

Mark R. Lewis
Brownfields Coordinator
Office of Constituent Affairs & Land Management

C: Ms. Dorrie Paar, EPA (via e- mail)

I. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

A. Target Area & Brownfields

i. Background & Description of Target Area – Norwalk (population 89,005) is a seaport community on the Long Island Sound that is easily accessible via Interstate 95 (I-95), Amtrak and Metro-North commuter rail. The distressed South Norwalk (SoNo) neighborhood along the city's working waterfront struggles with a manufacturing history that dates to the colonial period. SoNo's seaside location was once considered a prime spot for industry, which thrived for generations. Hats, clothing and other products were manufactured in this working-class neighborhood until the 1970s. When the factories closed, years of disinvestment in SoNo hid a legacy of soil and groundwater contamination.

One of SoNo's major industries was hat manufacturing. Until the mid-20th century, hat making involved processes with chemicals including mercury. As Lewis Carroll's "Mad Hatter" in *Alice's Adventures in Wonderland* demonstrates, these practices caused serious health impacts. As the furs of animals were separated from their skins, a solution containing mercuric nitrate was used as a smoothing agent. The phrase "mad as a hatter" is associated with felt hat workers, and the symptoms of exposure include cognitive and memory loss, mental instability, speech problems, and ataxia. Connecticut outlawed the use of mercury in hat making in the 1940s. However, mercury remains in the soil where factories once stood.

The low-income SoNo neighborhood (Census Tract 441) is the key revitalization "Target Area," with a long history of brownfields. The blighted Washington Village (the state's oldest public housing) was named a Choice Neighborhood by the U.S. Department of Housing and Urban Development (HUD) in 2010. Norwalk secured a HUD Choice Neighborhoods Planning grant to create a Transformation Plan for the dilapidated housing complex. The project subsequently received a $30 million HUD Choice Neighborhoods Implementation grant in 2014. Norwalk has since broken ground on a $108 million, LEED-ND mixed-use development with 136 high-quality public housing units, 68 affordable workforce units and 68 market-rate units. Additionally, the City and State have invested $9 million in road and sustainability improvements throughout the area. These public funds have leveraged an additional $350 million of private investment into the neighborhood. SoNo, Opportunity Zone ID# 09001044100, is an emerging neighborhood for young families. The cost of living is less expensive due to older housing stock as well as the area's industrial past. As such, it presents a risk to a growing population of residents vulnerable to hazardous substances and petroleum, including pregnant women and children. Redevelopment efforts in SoNo seek to reduce real health concerns.

The SoNo Train Station, serving 1.7 million transit riders annually, is located adjacent to densely populated residential neighborhoods in the Target Area of SoNo, and is less than 1/10th of a mile to two (2) elementary schools and less than ¼ mile from Ryan Park, the sole recreational space in SoNo. SoNo Train Station serves passengers along the Metro-North line, one of the busiest passenger railroads in North America (more than 86 million riders in 2017). Norwalk seeks EPA Brownfields resources to cleanup and redevelop a portion of the contaminated SoNo Train Station property (30 Monroe Street) to support transit-oriented development. A commuter parking garage is the planned reuse of the site. Growth surrounding the SoNo Train Station will be incentivized with federal tax incentives, derived through the area's Opportunity Zone designation in 2018.

ii. Description of Brownfield Site – Norwalk seeks to clean up a portion of the SoNo Train Station, which is currently used as a parking lot. The site consists of an irregularly-shaped parcel totaling 3.03 acres of land. Norwalk acquired the property from the Penn Central Railroad in 1971. Historical uses of the property raise the potential for on-site contamination. Former railroad operations have included the handling and potential disposal, dumping or releases of petroleum, solvents, coal, ash, and other potentially hazardous materials. Sanborn Fire Insurance Maps indicate that the site may have included hat manufacturing. Filling activities are suspected to have occurred on-site many decades ago. The location is listed by the Connecticut Department of Energy and Environmental Protection (CTDEEP) as a hazardous waste release site. Inorganic chemicals of concern associated with historic site operations include lead, arsenic, chromium, cadmium, mercury, and other metals. Organic chemicals of concern include petroleum hydrocarbons, volatile organic compounds (VOCs) and polynuclear aromatic hydrocarbons (PAHs).

The topography of the site is generally level. The property sits at approximately 20 feet above mean sea level. The nearest surface body water is Norwalk Harbor, located 2,000 feet east. The site was historically developed with manufacturing facilities, including the South Norwalk Electric Works Facility. The target property is also surrounded by nearby brownfields: 1) A parcel to the north had been used as a staging area for rail cars. Incinerator ash was remediated when the site was redeveloped into a Norwalk Police Department facility. 2) To the east, the vacant textile manufacturer Corday Tie sits. Manufacturing operations likely included use and storage of petroleum, inks/dyes, solvents, and other textile-related chemicals. 3) Land abutting the site to the southwest hosted a former hat manufacturer. Another adjoining southwest lot was previously a dry cleaner. Typical constituents related to these activities include various metals, chlorinated solvent compounds and petroleum hydrocarbons.

Residential properties surround the SoNo Train Station. As such, SoNo brownfields pose serious health, welfare and environmental risks. Phase I and II assessments have been conducted at 30 Monroe Street, indicating the presence of mercury, lead, arsenic, chromium, cadmium, petroleum hydrocarbons, and VOCs including chlorinated solvents such as tetrachloroethylene (PCE), trichloroethylene (TCE) and PAHs. Seven total remedial areas were identified on the property. More than 1,700 tons of impacted material we excavated and disposed of from three of those remedial areas in 2013. However, additional funding is needed to complete the cleanup at the four remaining areas.

B. Revitalization of Target Area

i. Reuse Strategy & Alignment with Revitalization Plans – The planned reuse of the site includes construction of a parking garage to serve one of the busiest passenger railroads in North America. Remedial efforts at the SoNo Train Station will help Norwalk meet the community's goals of growing mixed-use development and encouraging public transit use. Brownfields redevelopment in SoNo supports plans that seek to spur transit-oriented development. In 2016, the Norwalk Common Council adopted the *South Norwalk Transit-Oriented Development Redevelopment Plan*. The goal of this plan is to encourage private investment in underused land and buildings, and support the development of a compact, economically-diverse neighborhood within easy walking distance of the SoNo Train Station. The area designated for transit-oriented development is a patchwork of buildings and relatively small parcels. Current uses include surface parking lots, deteriorated buildings and industrial facilities. A major focus of the *South Norwalk Transit-Oriented Redevelopment Plan* is the preservation of existing affordable housing and the historic character of the area. Norwalk seeks to protect residents from displacement due to gentrification. Reclamation of brownfields in SoNo will help to expand housing choice and reduce the cost of living for low-income residents. Cleanup also aligns with the *Washington Village/South Norwalk Choice Neighborhoods Transformation Plan.* The planning effort brought residents, social service providers, city agencies, and community organizations together, and linked affordable housing with quality education, public transportation, good jobs, and safe streets. Brownfield investment in the SoNo Train Station complements this renewal effort.

ii. Outcomes & Benefits of Reuse Strategy – EPA resources will support Norwalk's efforts to revitalize the distressed SoNo neighborhood, improve property values, invigorate the local economy, provide long-term employment opportunities, remove human health and environmental hazards, and help spur economic growth within Opportunity Zone ID# 441. The area is prime for transit-oriented development. Brownfields investment that enables Norwalk to implement its *South Norwalk Transit-Oriented Redevelopment Plan* is expected to leverage 595 new market rate and affordable housing units, 37,557 square feet of retail space and approximately $24 million in City property taxes over a 30-year period. Of that projected development, 488 residential units have been built and leased. 276 residential units are under construction and include 3,870 sf retail space. 129 residential units are in permit and include 11,000 sf office and 5,800 sf retail. New housing and economic development opportunities will primarily benefit the area's low-income residents. New jobs will provide employment in people's backyard. Brownfields reclamation supports the creation of "inviting and active open space" that will provide young families with places to recreate. Smart growth will reduce transportation costs and enhance livability. Norwalk also encourages SoNo developers to "take into account best practices for energy-efficient and sustainable building design."

C. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse – Norwalk has extensive experience leveraging federal dollars with additional public and private resources. The City has already secured other funding resources to support the SoNo revitalization strategy, including a $30 million HUD Choice Neighborhoods Implementation grant to rebuild Washington Village, a $2 million Federal Highway Administration grant to improve signalization in the corridor, $640,000 in federal Transportation Alternatives pass-through funding from the Connecticut Department of Transportation (ConnDOT) for Complete Streets and streetscaping, and a $2 million Connecticut Office of Brownfield Remediation and Development grant to clean up contamination and improve recreational opportunities in nearby Ryan Park.

The following additional resources will be leveraged by EPA Brownfields dollars for redevelopment:

Source	Purpose	Amount	Status
Norwalk Health Department	In-kind outreach on public health	In-kind time	Pledged
Connecticut Office of Brownfield Remediation and Development, Brownfields Grant	Funding to continue remediation efforts	$1-2 million	Pending
ConnDOT, Transportation Alternative Grant	Funding to realign SoNo Train Station	$2-4 million	Pending
U.S. Department of Transportation (DOT), BUILD Grant	Funding to realign SoNo Train Station	$10 million	Pending

The Opportunity Zone designation of Census Tract 441 provides an additional tool to attract private sector interest. The City is actively reaching out to landowners, developers, tax experts, wealth advisors, and fund managers to promote the tax benefits, as well as market Norwalk properties.

ii. Use of Existing Infrastructure – The municipal burden to maintain underused infrastructure in the urban core increases as new development moves to Norwalk's fringe. Revitalization of SoNo takes advantage of the use of existing infrastructure in the area that has the capacity to handle this expansion. The area is fully served by roads, water and sewers, electricity, gas, parks, and other public utilities (including high speed internet). The target neighborhood is also home to the SoNo Train Station, which serves 1.7 million commuter rail riders annually. Brownfields cleanup supports proposed transit-oriented development in SoNo. Norwalk has invested in SoNo's infrastructure. HUD Community Development Block Grant dollars have helped to make SoNo streets more resilient to flooding. The City received a $2 million grant from the Connecticut Office of Brownfield Remediation and Development to enhance nearby Ryan Park. EPA Brownfields investment will also make Norwalk more competitive for other funds. In 2019, the City will seek resources to realign rail tracks at the SoNo Train Station, including DOT BUILD dollars.

II. Community Need & Community Engagement

A. Community Need

i. Community's Need for Funding – Norwalk is not able to complete cleanup of the site without EPA assistance. The Norwalk Redevelopment Agency has an annual budget of $1.6 million, which primarily supports payroll and operating expenses. The downturn in the economy has restricted Norwalk's ability to take on capital projects. Norwalk has also been forced to spend its limited resources recovering from damages sustained in seven nationally declared disasters since 2006, including Hurricane Irene (2011) and Hurricane Sandy (2012). More than 90% of the housing units in the SoNo floodplain were adversely impacted. In addition, public property and infrastructure losses in the area totaled more than $2.3 million. While Norwalk was able to clean up a portion of the site in 2013, it has been unable to complete remedial activities due to competing priorities for the City's limited funds. EPA funding will enable Norwalk to finish the project and move forward with the proposed transit-oriented redevelopment and reuse.

ii. Threats to Sensitive Populations

1. Health or Welfare of Sensitive Populations – The SoNo Train Station brownfield poses serious health and welfare concerns. Assessments conducted at the site have revealed hazardous materials comingled with

petroleum contamination, including mercury, lead, arsenic, chromium, cadmium, other metals, petroleum hydrocarbons, and VOCs including chlorinated solvents such PCE, TCE and PAHs. EPA has designated some of these substances as priority pollutants. As such, they are highly carcinogenic, mutagenic and teratogenic. This grant will allow the City to identify and address these threats and reduce environmental exposures to the sensitive populations in the Target Area.

The existence of harmful contaminants presents significant risks to SoNo's vulnerable populations, including minorities; pregnant women; children; low-income; and low educational attainment populations. Residents are exposed to contaminants of a daily basis via ingestion, inhalation and/or dermal contact with contaminated soils and/or groundwater. As discussed, exposure to mercury can impair neurological development, as well as damage the gastrointestinal tract, nervous system and kidneys. High prenatal exposure to PAH is associated with lower IQ, childhood asthma and other adverse birth outcomes. EPA has named TCE as "carcinogenic to humans and as a human non-cancer health hazard." Sensitive populations and those with certain diseases (*e.g.*, diabetes) or lifestyle factors (*e.g.*, alcohol consumption) are more at risk to TCE exposure. Lead interferes with a variety of body processes and is toxic to many organs and tissues. Low levels of lead in the blood of children can result in permanent damage to the brain and nervous system, leading to behavior and learning problems, lower IQs, slowed growth, and anemia. Pregnant women are also highly vulnerable to lead exposure, which can result in serious effects on the pregnancy and the developing fetus.

Furthermore, brownfields have produced a negative psychological impact in SoNo. Contaminated sites have cut people off from downtown and disconnected neighborhoods. Blight has attracted crime. Recently, the Federal Bureau of Investigation was called into SoNo to help the City address rising gun violence. EPA funding will initiate the process to clean up these contaminants and reduce exposure threats to sensitive populations, improve health conditions and the overall welfare of the Target Community.

2. Greater than Normal Incidence of Disease & Adverse Health Conditions – Exposure to hazardous substances is likely a contributor to poor health outcomes. The Connecticut Tumor Registry shows higher cancer rates in Fairfield County (520.6 per 100,000), where the Target Area is located, than across the state (509.4 per 100,000). CDC 500 Cities Projects provides data that indicates high concentrations of asthma and incidences of childhood lead poisoning cases. Exposure to heavy metals, including lead and mercury, can cause immune, cardiovascular, developmental, gastrointestinal, neurological, reproductive, respiratory, and kidney damage, as well as cancer. Residents are acutely aware of these dangers posed by such contaminants such as lead and mercury (two common contaminants in the Target Area due to former manufacturing and hat-making industries) in the soils and groundwater of SoNo. Norwalk ranks fifth in the state for active lead poisoning cases, according to the Connecticut Department of Public Health. Lead concerns intensified following national attention on the health crisis in Flint, Michigan. In 2016, the City Health Department identified 66 Norwalk children with high lead exposure. Cleanup along this contaminated corridor will help to mitigate these risks.

3. Disproportionately Impacted Populations – SoNo has historically been a mix of industry and working-class neighborhoods. Much of the Norwalk's manufacturing base was once located in SoNo. The Target Area currently hosts multiple gas stations, body shops, dry cleaners, metal finishing companies, marinas, and fuel yards. SoNo is one of several state designated Environmental Justice (EJ) communities within the City of Norwalk. Brownfields have unquestionably impacted the economy of SoNo. Contaminated sites depress area property values and reduce city tax bases. The unattractiveness of these properties has contributed to blight and crime. Brownfields have repelled businesses from SoNo and cost distressed neighborhoods job opportunities. As time has marched on, community disinvestment in SoNo has only intensified. According to the U.S. Census Bureau's 2012-2017 American Community Survey, poverty rates are more than two times higher in SoNo than across the city (18.9% compared to 9.2%), and household median income is approximately 20% less in Census Tract 441 ($68,571) compared to Norwalk as a whole ($81,546). As such, a greater percentage of SoNo residents rely upon Food Stamp and Supplemental Nutrition Assistance Program benefits (16.3% compared to 8.0%). More than 15% of SoNo households do not own a vehicle. Exactly 15.0% of the adults in SoNo have no high school diploma. SoNo is a majority-minority community, with 66.1% non-white

residents. Revitalization efforts in SoNo will create tremendous economic benefits. For years, businesses have bypassed SoNo for other areas of Southwestern Connecticut. Cleanup of the SoNo Train Station is critical to creating a vibrant, mixed-use community. Outcomes of successful transit-oriented development will include new jobs for Target Area residents. Remediating contaminants in this low-income neighborhood will limit exposure to hazardous substances, particularly for children and pregnant women, thereby reducing cancer risks. Brownfields cleanup will also remove blight and crime and increase community pride.

iii. Community Engagement

i. Project Partners and ii. Project Partner Roles – A Community Engagement Team will be formed to share information and gather community input. This team will organize and host a series of 3 meetings during the project timeframe. Local outreach activities will focus on Target Area SoNo residents, particularly sensitive populations. The purpose of this engagement is to share information, collect feedback and describe next steps. Input will also be gathered to shape the cleanup and reuse of the Site.

Partner Name	**Point of Contact (name, email & phone)**	**Specific Role in Project**
Mayor's SoNo Task Force - *Comprised of SoNo residents, business owners and other stakeholders*	Bill Collins 9collins@optonline.net 203 846 1109	Steering Committee, conduct outreach to educate community about project and support economic development activities
SoNo Alliance - *Neighborhood association*	Rebecca Prosper rprosper@norwalkct.org 203 854 3002	Steering Committee, conduct outreach and encourage residents/ businesses to participate in cleanup and reuse planning process of project
Greater Norwalk Chamber of Commerce - *Business association*	Brian Griffin bgriffin@ norwalkchamberofcommerce.com 203 866 2521	Steering Committee, conduct outreach and encourage businesses to participate in the project, and support economic development
Housing Authority of the City of Norwalk - *Assists lower-income individuals and families find local housing*	Adam Bovilsky abovilsky@norwalkha.org 203 838 8471	Help conduct community outreach, and help engage residents of Washington Village in the cleanup and reuse planning process.
Norwalk Health Department - *Local health department*	Deanna D'Amore ddamore@norwalkct.org 203 854 7776	Provide health technical assistance and help conduct community outreach
Norwalk Community College - *Educational center*	David Levinson dlevinson@ncc.commnet.edu 203 857 7000	Conveniently located, Norwalk Community College will provide space for community meetings
Community Health Center - *Local Health Center*	John Gettings jgettings@NCHC.org 203 899 1770	Provide health technical assistance and help conduct community outreach
South Norwalk Community Center	Robert McDowell bmcdowell@riverbrookymca.org 203 295 3380	Provides social services / children services in the South Norwalk community and will help conduct community outreach / meeting space

iii. Incorporating Community Input – Norwalk recognizes the role of community engagement in project success. Representatives from Project Partner organizations will be invited to participate on the Steering Committee. Staff will meet regularly with these groups (initially and at least quarterly thereafter). Partners will also help engage residents and businesses. Personnel from the Norwalk Health Department will share information with residents on the safety of remediated brownfields. Engagement activities will occur at convenient times, be centrally located and provide childcare to maximize participation. Traditional mass media, including the community newspaper and area radio stations, will be used to disseminate information. Project updates will be provided at scheduled meetings, including Common Council sessions. Web sites and social media will describe brownfields efforts and promote engagement opportunities. Norwalk will also

communicate through newsletter mailings and other communication tools. All written outreach materials will be made available in English and Spanish. The proposed outreach tools are appropriate for the community, as Norwalk has used these communications methods with previous success.

III. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS

A. Proposed Cleanup Plan – Based upon the results of a previous Phase II assessment, the site is not suitable for reuse without cleanup. As described in the attached Analysis of Brownfields Cleanup Alternatives (ABCA), three remediation approaches were considered:

- Alternative #1: No action. This alternative is not effective in controlling or preventing the exposure of potential receptors to contamination at the site.
- Alternative #2: Capping is an effective way to prevent potential receptors that could come into direct contact with contaminated soils on the subject property, if the cap is maintained. Alternative #2 involves removal of pavement and excavation to a depth of 27 inches. The site would then be restored with 24 inches of clean backfill material and paved with a minimum of 3 inches of asphalt. This alternative requires filing an Environmental Land Usage Restriction (ELUR) with the Connecticut Department of Energy and Environmental Protection to restrict future site use to industrial/commercial purposes. The approximate cost of Alternative #2 ranges from $371,000 - $474,000.
- Alternative #3: Excavation with off-site disposal of impacted soil followed by backfilling excavations with clean materials is an effective way to eliminate risk for all potential receptors, while still allowing access to the subsurface for future development, as contamination will be removed and the exposure pathways, including the potential for vapor intrusion, will no longer exist. Alternative #3 also meets the remedial goals established for the site and an ELUR would not be required. The approximate cost of Alternative #3 ranges from $547,000 to $687,000.

The City cannot accept Alternative #1 as it does not address the identified risks. Alternative #2 will not achieve the remedial goals established for the site if chemicals are left on-site at concentrations that exceed residential criteria. Alternative #3 is the preferred and most cost-effective approach for removing risk. Norwalk will enroll the property in Connecticut's Voluntary Cleanup Program. The City will contract with environmental professionals to comply with and submit all required state documentation. A professional engineer will develop and review necessary design and institutional control plans, as needed.

B. Description of Tasks/Activities and Outputs

i. Project Implementation, ii. Anticipated Project Schedule, iii. Task/Activity Lead and iv. Outputs

EPA funding will enable Norwalk to build on past successes and cleanup the contaminated SoNo Train Station. The project will engage community residents, finalize the ABCA, and excavate and dispose of contaminated soils. This work is critical to achieving transit-oriented development in Norwalk. Norwalk will ensure timely implementation of key activities by: Procuring Contractors: Environmental contractors will be hired to support community engagement, finalize cleanup plans and remediate the Site. Services will be solicited through a Request for Proposals (RFP) process. Robust Monitoring and Reporting: Norwalk will establish specific benchmarks, evaluate ongoing progress and keep EPA abreast of all project developments. Strong State and EPA Coordination: The City will enroll its site into Connecticut's Voluntary Cleanup Program. EPA Region 1 and the State will be invited to review plans.

Task / Activity	**TASK #1**
i. Project Implementation	**COOPERATIVE AGREEMENT OVERSIGHT**
Discussion of EPA-funded activities	Management & execution of cooperative agreement oversight activities including but are not limited to: EPA Reporting (ACRES, MBE/WBE, FFR and Quarterly Reports, Close Out); procurement & management of a qualified environmental professional (QEP); maintaining financial records & completing drawdowns; maintaining project files & administrative record; project coordination with stakeholders; quarterly Steering Committee meetings, and ensuring the program remains on schedule and budget. Travel & attendance at National Brownfields Conference.

Non- EPA grant resources needed to carry out task / activity, if applicable	The City will provide in-kind services in the form of staff time for cooperative agreement oversight activities ($50/hour for 50 hours).
ii. Anticipated Project Schedule	General C.A. Oversight activities will occur over the lifetime of the grant. The City will competitively procure a QEP by 12/31/20. Kick off program January 2021. Quarterly Reports will be submitted within 30 days after the end of each reporting period (Jan / April / July / Oct). Annual FFR and M/W/DBE reports will be submitted by October 30 of each grant year. ACRES will be updated when cleanup activities are started/completed, when new information becomes available & any other major milestones. Quarterly Steering Committee meetings. Final Closeout report will be submitted within 90 days after cooperative agreement period of performance ends.
iii. Task / Activity Lead(s)	The City will lead this task in coordination with and assistance by their partner, the QEP, who will provide technical expertise and provide programmatic assistance, including preparing QRs, ACRES, etc.
iv. Output(s)	EPA Reporting (ACRES, 3 annual FFR & M/W/DBE reports, 12 Quarterly Reports, Closeout Report, etc.), prepare request for qualifications for QEP and procure QEP, grant drawdown requests, 12 Steering Committee Meetings, attendance at National Brownfields Conference.
Task / Activity	**TASK #2**
i. Project Implementation	**COMMMUNITY OUTREACH & INVOLVEMENT**
Discussion of EPA-funded activities for the priority sites	A key project component is continued community engagement, commencing in the second quarter of the project. A total of 3 public meetings will be conducted throughout the project period to share information, collect feedback and describe next steps. The City will establish and maintain an information repository for the site at the City's library and will designate a Community Relations Spokesperson. The City will conduct extensive outreach and communication with Target Area residents and community stakeholders prior to undertaking the cleanup efforts and following the successful completion of remediation. The QEP will prepare a draft Community Relations Plan (CRP). The CRP will outline the steps to provide reasonable notice of proposed cleanup activities, opportunity for public involvement, response to comments, and other records that are available to the public. The draft CRP and an updated ABCA will be presented to the public a community meeting for review and comment over a 30-day comment period
Non- EPA grant resources needed to carry out task / activity, if applicable	The City will provide in-kind services in the form of staff time for community outreach activities ($50/hour for 50 hours). The City will provide additional in-kind services in the form of materials/supplies (stationary / postage and mailings / etc.), as well as additional staff hours, as needed, beyond those that have been budgeted for as part of this task. The City will use the Agency for Toxic Substances and Disease Registry (ATSDR) Brownfields/Land Revitalization Action Model to foster dialogue among the diverse members of the community
Anticipated Project Schedule	Community Outreach and Involvement activities are expected to commence in the Winter of 2021 with the generation of CRP and occur over the lifetime of the grant. The City anticipates completing three (3) public meetings: 1) Post-CRP / Updated ABCA ~Spring 2021; 2) Mid-Cleanup to discuss project status and solicit feedback from the community regarding proposed redevelopment ~Fall/Winter 2021; 3) and Post-Cleanup ~Spring/Summer 2022).
Task / Activity Lead(s)	THE CITY will lead community engagement activities. Susan will be supported by the Norwalk Redevelopment Agency's Neighborhood Improvement Coordinator, David Shockley. In addition, the QEP will be the City's partner and will support the City by providing technical expertise and other community outreach assistance.
iv. Output(s)	3 public meetings to share information, collect feedback and describe next steps; Community Relations Plan (CRP) outreach and presentation materials, public notification advertisement and other media updates, establish administrative record.

Task / Activity	**TASK #3**
i. Project Implementation	**SITE SPECIFIC CLEANUP ACTIVITIES**
Discussion of EPA-funded activities for the priority sites	Cleanup activities to be conducted at the 30 Monroe Street Site include the excavation and off-site disposal of 1,400 tons of impacted soils. This approach has an estimated cost of approximately $547,000. Major expenses costs include transportation and disposal of regulated soils, as well as backfill, dust & erosion controls/air monitoring and temporary fencing to secure site access. These activities will be conducted by qualified environmental cleanup contractor competitively procured by the City and overseen by the City's QEP. The site-specific cleanup activities are anticipated to be conducted over the months 6 – 24 of the grant period, including generation of cleanup planning documents such as ABCA/Remedial Action Plan (RAP), Health & Safety Plan (HASP), Quality Assurance Project Plan (QAPP), response to public comments, generation of bids and specifications, procuring a remediation contractor, conducting remediation activities, confirmation sampling activities, and soil management and Disposal related activities and documentation.
Non-EPA grant resources needed to carry out task / activity, if applicable	The City's cost share of $95,000 in cash contributions will support additional remediation contractor and/or QEP services, including but not limited to the generation of a final as-built survey ($20,000) and post-remediation groundwater monitoring well installation and sampling activities ($75,000). The City will provide additional in-kind services in the form of staff time, as needed, beyond those that have been budgeted for as part of this task to manage the cleanup process.
Anticipated Project Schedule	The site-specific cleanup activities are anticipated to be conducted over the months 6 – 24 (Winter/Spring 2021 – Fall 2022) of the grant period
iii. Task / Activity Lead(s)	The QEP will lead the generation of cleanup planning documents. Remediation will be carried out by a licensed, environmental contractor under the oversight of the QEP. The QEP will ensure that cleanup meets applicable statewide standards and complies with EPA requirements.
Output(s)	Updated ABCA/RAP, QAPP, bid specifications, HASP, 1,400 tons of contaminated soil removed and properly disposed of, and three acres ready for reuse on a remediated site that no longer poses a threat to the community.
Task / Activity	**TASK #4**
i. Project Implementation	**OVERSEE SITE CLEANUP**
Discussion of EPA-funded activities for the priority sites	The QEP will work with the City to enter the Site into the CTDEEP Voluntary Cleanup Program and prepare the required CTDEEP reports, as applicable, for the project. During the course of remedial activities, the QEP will perform oversight activities to ensure all remedial actions were completed in accordance with the EPA approved ABCA / RAP and meet applicable statewide standards and will document all activities in a Cleanup Completion and Closure Report.
Non- EPA grant resources needed to carry out task / activity, if applicable	The City will provide in-kind services in the form of staff time for overseeing site cleanup activities ($50/hour for 50 hours). If necessary, the City will provide in-kind services in the form of staff time for any additional hours beyond those that have been budgeted for as part of this task.
ii. Anticipated Project Schedule	Commence Summer 2022 and complete by end of grant performance period. The city is confident all work can be completed within 3 years.
iii. Task / Activity Lead(s)	The QEP will lead these tasks. The City, with assistance from the QEP, will enroll the site into the CT's voluntary cleanup program.
iv. Output(s)	Cleanup Completion & Closure Report, CTDEEP reports, as applicable, and letter of cleanup completion from Connecticut Office of Brownfield Remediation and Development

C. Cost Estimates

Norwalk seeks $500,000 of Hazardous Substances federal funding. The budget was developed with input from environmental contractors and based upon past brownfields experience with similar projects: **Task 1**: Personnel = $5,00 (100hrsx$50/hr – includes fringe); Brownfield Conference – 1 attendee (travel, lodging, per

diem) = $2,000; Contractual = 12 QRs (@ $125 ea. = $1,500) per plus general Programmatic Oversight Assistance (45 hours x $100/hour = $4,500) = $6,000. **Task 2**: Personnel time = $5,000 (100hrsx$50/hr); Contractual = $5,000 [($1,000/mtg x 3 public meetings) + $2000/CRP]; **Task 3**: Contractual: $452,000 [QEP = $75,000 (750hrs @ $100/hr average) + Remediation Contractor $377,000 ($157,375 in remediation contractor costs plus soil transportation and disposal costs ($140,000 for 1,400 tons of soil at $100/ton); backfill ($23,375 for 935 tons at $25/cy); dust and erosion controls / air monitoring ($46,250); and temporary site fencing ($10,000)]. **Task 4**: Personnel = $5,000 (100 hrs x $50/hr); Contractual = Cleanup/Completion Reports = $20,000.

Budget Categories	**Project Tasks**				
	1.Cooperative Agreement Oversight	**2.Community Outreach & Engagement**	**3.Site-Specific Cleanup Activities**	**4.Oversee Site Cleanup**	**TOTAL**
Personnel	$5,000	$5,000	$0	$5,000	**$15,000**
Travel	$2,000	$0	$0	$0	**$2,000**
Equipment	$0	$0	$0	$0	**$0**
Supplies	$0	$0	$0	$0	**$0**
Contractual	$6,000	$5,000	$452,000	$20,000	**$483,000**
Other	$0	$0	$0		**$0**
Total Direct Costs	$13,000	$10,000	$452,000	$25,000	**$500,000**
Indirect Costs	$0	$0	$0	$0	**$0**
Total Federal Funding	$13,000	$10,000	$452,000	$25,000	**$500,000**
Cost Share	$2,500	$2,500	$95,000	$0	**$100,000**
Total Budget	**$15,500**	**$12,500**	**$547,000**	**$25,000**	**$600,000**

***Cost Share* –** The Norwalk Redevelopment Agency will provide $95,000 in cash match contributions to support cleanup activities [through additionally needed QEP and environmental contractor services, including but not limited to, the generation of a final as-built survey ($20,000) and post-remediation groundwater monitoring activities, including re-establishing the groundwater monitoring network ($75,000), plus $5,000 ($50/hr x 100 hrs) in in-kind staff time split evenly to administer cooperative agreement oversight and community involvement activities, for a total of $100,000 in cost share / match.

D. **Measuring Environmental Results –** Norwalk will systematically track and measure progress. Quarterly reports and internal project management software will be used to help ensure that cleanup activities are moving along, and that project outputs and outcomes are being achieved. The project manager will be responsible for this performance measurement. Data will be regularly entered into ACRES. An established work plan, to be approved by EPA, will guide project results. The project manager will evaluate progress based upon milestones identified in the work plan. This will provide safeguards that grant funds are expended in a timely and efficient manner. This process has been followed in the past and has been both successful and effective. If the project is not on schedule, the reasons will be documented in the quarterly report and a corrective action plan will be implemented to get on track again.

IV. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

A. Programmatic Capability

i. Organizational Structure and ii. Description of Key Staff – Norwalk has a long track record of successfully managing community projects. Key to this effort is the development of a detailed work plan with clear milestones and responsibilities. This will be developed at an initial meeting, including participation from the Redevelopment Agency's Executive Director and other key staff. Mark Lewis, Connecticut's Brownfields Coordinator, and other key state officials will be invited to participate. The meeting will identify goals and strategies, and responsibilities within the work plan will be delineated. Performance measures will be established in order to track progress. To ensure that the project is on schedule, status updates will be

incorporated into the City's existing reporting structure. The City has the staff expertise necessary to manage the project. EPA project management duties will be assigned to Susan Sweitzer, the Norwalk Redevelopment Agency's Senior Project Manager for Development. Her areas of expertise include downtown revitalization and redevelopment. Susan has been with the Redevelopment Agency since 1985 and has managed both EPA Assessment projects. She will serve as a liaison between EPA Region 1 and Norwalk, and will be responsible for ensuring compliance with the administrative and reporting requirements of the cooperative agreement. Susan will lead all of the community engagement activities associated with the grant and will be responsible for hiring and managing paid QEP and environmental contractors.

Susan will be supported by a qualified team of interdepartmental staff, including; **Brian Bidolli** who has recently become the Norwalk Redevelopment Agency's Executive Director. He managed redevelopment initiative and had experience working with d Brownfields funding when employed in Bridgeport. **David Shockley** has been the Norwalk Redevelopment Agency's Neighborhood Improvement Coordinator since 2007. He will support community outreach activities for the project. **John Slovak** has served as the Norwalk Redevelopment Agency's Comptroller since 2005. John's responsibilities include financial accounting and budgeting. **Mario Coppola** is Norwalk's Corporation Counsel. Mario will address any liability concerns. ***A Steering Committee will also be formed, including representatives from the Project Partners*.** It will meet regularly (initially and at least quarterly thereafter) to direct the project and assure that it will be completed with the 3-year timeframe.

iii. Acquiring Additional Resources – Norwalk will hire a QEP and qualified contractors to complete cleanup plans and conduct remedial actions at the 4-remaining remedial sites at the SoNo Train Station. These services will be solicited using competitive procurement practices and in accordance with all federal and state requirements. The City's established procedures include seeking statements of qualifications and price. Professionals with previous EPA Brownfields experience will be encouraged to compete. The Connecticut Office of Brownfield Remediation and Development will provide technical assistance, share best practices and review cleanup plans. The City will enroll the site into Connecticut's Voluntary Remediation Program**.** The Norwalk Health Department will provide risk communication assistance. In addition, Norwalk will coordinate with the New Jersey Institute of Technology (EPA Region 1's Technical Assistance to Brownfields provider).

B. Past Performance & Accomplishments

i. Currently Has or Previously Received EPA Brownfields Grants

1. Accomplishments – Norwalk's 2006 EPA Assessment funding was critical in establishing the City's brownfields program. The grant supported the development of an inventory that identified 261 brownfield sites. Assessments were conducted at 8 sites, primarily City-held properties. This funding was able to leverage an additional $300,000 from the state to remediate a surface parking lot on the east side of the SoNo Train Station. Remediation efforts were completed in 2013. The City is considering conveying these sites to a private developer to support parking at the SoNo Train Station. The 2014 Assessment grant (which was extended and closed on September 30-, 2019) helped Norwalk build on its brownfields success. Project outputs included: public outreach materials, 2 public meetings, 7 Phase I assessments, 5 QAPPs, 2 Phase II assessments, 1 Phase III assessment, 1 cleanup/reuse plan and 1 success story. The City's brownfields inventory was also updated and prioritized within each targeted redevelopment district. The grant has helped the City leverage over $71 million in additional cleanup and redevelopment funding from private, state and/or federal partners. The outcomes of this work have included affordable housing, public recreational space, new jobs, increased tax revenues, and higher property values. ACRES is up to date.

2. Compliance with Grant Requirements – Norwalk has successfully managed EPA funds. Work plans and schedules were developed and followed for the 2006 and 2014, and all proposed outputs and outcomes were achieved. All 2006 grant funds were expended on time and only $4,811.06 of 2014 petroleum resources were returned. All 2006 grant terms and conditions were satisfied, including the timely filing of quarterly reports, financial status reports and closeout report. Norwalk is duplicating closeout compliance with the 2014 award.

EPA Clean-Up Grant Public Notice of Intent to Apply
November 25, 2019

Please print clearly as this information will be used to communicate project addenda

Name **E-mail**

There were no attendees and no comments have been received.

PUBLIC NOTICE: NORWALK REDEVELOPMENT AGENCY POUBLIC MEETING

regarding South Norwalk Train Station Eastbound Monday November 25, 2019 Norwalk City Hall 125 East Avenue Norwalk CT Room 101 3:30pm.

Invitation to review and comment: Interested parties are invited to comment on the Agency's application for an EPA Brownfields Cleanup Grant at the South Norwalk Railroad Station at 30 Monroe Street. A draft application to the EPA seeking EPA Brownfields Cleanup Grant and the associated Analysis of Brownfields Cleanup Alternatives will be available for public review by hard copy at the meeting and is available through the link attached to this Notice. The Agency invites comment in person at the meeting, via e-mail to ssweitzer@norwalkct.org. Subject line should read EPA Application Comment or by hard copy to Norwalk Redevelopment Agency, 3 Belden Avenue, Norwalk, CT 06850. Comments maybe made anytime but much be received by December 2, 2019 to be incorporated into the EPA Application.

EPA Grant Application draft 2019 Cleanup Grant Application.msg

Analysis of Brownfields Cleanup Alternatives
South Norwalk Train Station
30 Monroe Street
Norwalk, Connecticut

I. Introduction & Background

This Analysis of Brownfields Cleanup Alternatives (ABCA) has been prepared to evaluate cleanup alternatives for 30 Monroe Street in Norwalk, Connecticut (the Site). The ABCA is a condition of the City of Norwalk's application for a Brownfields Cleanup Grant provided by the United States Environmental Protection Agency (EPA). The cleanup will be performed by the City of Norwalk (the City) to make the property ready for sale and redevelopment as part of the City's Transit-Oriented Development program.

The Site is subject to the Connecticut Department of Energy and Environmental Protection (CT DEEP) Remediation Standard Regulation (RSRs) of the Regulations of Connecticut State Agencies (RCSA) Section 22a-133k-1 through -3, inclusive. Groundwater at the Site is classified as GB, and only the Surface Water Protection Criteria (SWPC) applies to groundwater analytical results at the Site. The GB pollutant mobility criteria (GB PMC) will apply to the leachability of chemicals from soil. The property is currently developed for Industrial/Commercial uses and the Industrial/Commercial Direct Exposure Criteria (I/C DEC) could be compared to soil analytical results. However, use of the I/C DEC would require that an Environmental Land Use Restriction (ELUR) be applied for following remediation. To avoid the requirement for an ELUR, remediation could be performed to achieve compliance with the Residential Direct Exposure Criteria (Res DEC).

1. Site Location

The Site, owned by the City of Norwalk (parcel 2-55-28-0), is currently used as a parking lot at the South Norwalk Train Station with a platform with access to eastbound trains. The Site consists of an irregularly-shaped parcel totaling 3.03 acres of land. The Site is improved with a single-story 5,565 square foot train station building and covered platform. The remaining portions of the Site exist as paved parking areas and driveways.

The Site is located east/southeast of the Metropolitan Transportation Authority (MTA) Metro-North rail line. Access to the Site is available from Monroe Street, which forms the northern boundary, and Henry Street, which forms the southern boundary. Industrial/Commercial properties are located to the east of the Site.

2. Forecasted Climate Conditions

EPA requires that the ABCA consider potential impacts due to climate concerns. Specifically this discussion addresses observed and forecasted climate change conditions for the area of the project and associated site specific risk factors. Norwalk, Connecticut is located on Long Island Sound and additional portions of the City are located along tidal estuaries, including the Norwalk River. The Site is located approximately 2,000 feet west from Norwalk Harbor and elevated relative to the harbor.

The northeastern United States, including Norwalk, experiences warm and often humid summers and cold winters. Rainfall can be severe with summer thunderstorms common and severe weather resulting from regional nor'easter anticyclone storms and/or hurricanes. Winter

conditions can also be severe with ice storms and heavy snow common. Snowfalls of 2-3 feet in one event are not uncommon. The Site is located outside the Norwalk Harbor 100-year flood plain.

According to the US Global Change Research Program website (http://www.globalchange.gov/explore/northeast), as a result of climate change, the northeast region can expect increased temperatures and temperature variability and extreme precipitation events. The website states that "Heat waves, coastal flooding, and river flooding will pose a growing challenge to the region's environmental, social, and economic systems. This will increase the vulnerability of the region's residents, especially its most disadvantaged populations. Infrastructure will be increasingly compromised by climate-related hazards, including sea level rise, coastal flooding, and intense precipitation events." The State of Connecticut Climate Change Summary is attached as Attachment A.

According to FEMA Flood Insurance Rate Map for the City of Norwalk, # 0900120007C, the Site is located within "Zone C" indicating an area of minimal flooding (outside the 100-year floodplain). Therefore, the biggest threat to this Site is from localized stormwater impacts from extreme precipitation events. Other forecasted climate change factors such as sea level rise, storm surge effects, and saltwater intrusion have limited potential to affect the Site in the future given its geographic and topographic location, approximately 108 feet above sea level. According to the forecasted coastal climate change assessments that have been conducted by the City of Norwalk, the Site is not anticipated to be located in the 100-year flood zone by 2070. Ground thaw and freezing and wildfires are also not anticipated to affect the Site.

3. Previous Site Use(s) and Any Previous Cleanup / Remediation

Historical filling activities are suspected to have occurred at the Site and it is listed as a suspected hazardous waste site for dumping of solvents. The Site area was historically developed (circa 1920s to 1960s) with manufacturing facilities, including the South Norwalk Electric Works Facility which is an existing power generating facility located potentially upgradient of the Site.

The property to the north of the Site (along the rail line) was the subject of a large-scale assessment and remediation project funded through the Connecticut Brownfields Program. Incinerator ash from nearby manufacturing facilities had been used to fill this property and it had been used as a rail yard and subsequent staging area for rail cars. The property to the north has been subsequently developed as a police station.

Historical sources also identified a property abutting the Site to the southwest as a former hat manufacturer (circa 1884). A second property also abutting the Site to the southwest was identified on a 1957 Sanborn map as a dry cleaner. A review of available city directories from this time period could not confirm the existence of the dry clean operation but rather identified the business located at 9 Mulvoy Street as a "cleaner and dyer." Historical sources also identify Corday Tie, a textile manufacturer, located to the east of the Site.

Three (3) areas of the Site, designated as remedial areas 1A, AB, and 2, were previously remediated by the City by soil excavation and off-site disposal in November 2012.

- Remedial Area 1A: Approximately 940 tons of soil impacted with arsenic and PAHs were removed and disposed offsite. Post excavation confirmatory samples were collected, and remedial goals were achieved. The excavation was backfilled following the receipt of confirmatory sample results.

- Remedial Area 1B: Approximately 388 tons of soil impacted with arsenic and PAHs were removed and disposed offsite. Post excavation confirmatory samples were collected, and remedial goals were achieved. The excavation was backfilled following the receipt of confirmatory sample results.

- Remedial Area 2: Approximately 405 tons of soil impacted with arsenic and PAHs were removed and disposed offsite. Post excavation confirmatory samples were collected, and remedial goals were achieved. The excavation was backfilled following the receipt of confirmatory sample results.

II. Site Assessment Findings

1. Phase I Environmental Site Assessment (ESA), Vanasse Hangen Brusltin (VHB), July 2008

The Phase I investigation completed by VHB identified the following environmental concerns for the Site:

- Historical and Current Site Operations. Historical uses of the Site raise the potential for on-Site contamination. Historical railroad operations may have included the handling and potential disposal, dumping, or releases of petroleum, solvents, coal, ash, and other potentially hazardous materials. Reviewed Sanborn Fire Insurance Maps indicate that portions of the Site may have included hat manufacturing. Inorganic chemicals of concern (COCs) associated with historic Site operations include lead, arsenic, chromium, cadmium, mercury, and other metals. Organic COCs include petroleum hydrocarbons, volatile organic compounds, and polynuclear aromatic hydrocarbons (PAHs).

- Potential Filling of the Former On-Site Pond. Historical maps indicate the presence of a former pond that was filled circa 1889. Fill materials may have been impacted with lead, arsenic, mercury, petroleum hydrocarbons, or PAHs.

- Potential Demolition and Filling of Former On-Site Residential Structures. Historical maps indicate the presence of residential structures on the south of the property. These properties were demolished and there is potential for cellars of these structures to have been filled. Fill materials may have been impacted with lead, arsenic, mercury, petroleum hydrocarbons, or PAHs.

- Potential Off-Site Sources. Soil and groundwater impacts have been documented at the South Norwalk Electrics property to the west of the Site and the remediated site to the north. Identified impacts included metals associated with fill materials (e.g., ash, coal, and slag) and petroleum and solvent releases.

2. Phase II ESA, VHB, November 2008

The Phase II investigation consisted of advancing eleven soil boring and the construction of three permanent groundwater monitoring wells. Samples were analyzed for VOCs, PAHs, metals, and extractable total petroleum hydrocarbons (ETPH). Based upon the findings of the Phase II investigation, five release areas were identified on Site. These release areas are described as follows:

- Release Area 1: Concentrations of PAHs, arsenic, and ETPH were reported exceeding applicable remedial criteria in two shallow soil samples. Reported PAH concentrations exceeded the GB PMC, Res DEC, and I/C DEC, reported arsenic concentrations exceeded the Res DEC and I/C DEC and reported ETPH concentrations exceeded the Res DEC. As described above, the two areas of identified soil impacts were remediated as Remediation Areas 1A, 1B, and 2.

- Release Area 2: Concentrations below applicable remedial criteria of VOCs, PAHs, ETPH, and metals were identified during the Phase II investigation at depths of 12 to 16 feet below grade. Identified impacts appear to be related to historical filling of the former pond. Remediation of this Release Area is not required to comply with applicable remedial criteria.

- Release Area 3: Concentrations below applicable remedial criteria of VOCs and metals were identified during the Phase II investigation. A potential source was not identified but remediation of this Release Area is not required to comply with applicable remedial criteria.

- Release Area 4: PAH and metals impacts were identified in the southern portion of the Site. Reported concentrations of copper and arsenic were reported at levels exceeding the GB PMC and Res DEC in shallow soil. Four separate areas are designated for remediation.

- Release Area 5: Levels of VOCs below applicable remedial criteria were reported in groundwater. A potential source was not identified but remediation of this Release Area is not required to comply with applicable remedial criteria.

3. Targeted Brownfields Assessment (TBA), Advanced Environmental Solutions, December 2009

The TBA investigation consisted of advancing twenty-nine soil borings and the construction of seven groundwater monitoring wells. The purpose of the TBA was to more completely delineate the horizontal and vertical extent of the release areas identified in the Phase II ESA. The conclusions of the TBA are summarized as follows:

- Field observations and laboratory analytical results indicate that Release Areas 1, 2, and 5 have been impacted by COCs.

- Concentrations of VOCs in groundwater did not exceed applicable remedial criteria.

- Trace amounts of ash-like material were observed in Release Area 4 in soil borings from approximately 2 feet below grade.

III. Project Goal

As part of the City's ongoing Transit-Oriented Development Program, 30 Monroe Street will be remediated to comply with CT DEEP residential standards. Following the completion of cleanup activities, the property is anticipated to be sold to for reuse and redeveloped by a third party. The cleanup and redevelopment of the Site will revive the neighborhood, invigorate the local economy, provide near-term and long-term employment opportunities, utilize sustainability in its cleanup

and redevelopment, and remove human health and environmental impacts due to contamination of soil at the Site.

IV. Applicable Regulations and Cleanup Standards

1. Cleanup Oversight Responsibility

The City of Norwalk, as the current property owner, will undertake responsibility to remediate contaminated soil prior to the sale of the property. Remedial activities will be overseen by a qualified environmental professional (QEP) who will be responsible for collection of excavation confirmatory samples, reviewing analytical results, and evaluation of backfill analytical data to determine that it complies with the requirements of CT DEEP.

2. Cleanup Standards

The CT DEEP is the state authority that regulates remediation of sites in the State of Connecticut. The Site is not currently regulated by CT DEEP because it is not currently entered within the Property Transfer Program (per Sections 22a-134 through -134e of the Connecticut General Statutes (CGS)) or the Voluntary Remediation Program (per Sections 22a-133x or 22a-133y of the CGS). However, remediation of sites to comply with the RSRs is required by CT DEEP if remedial actions are performed. The remedial goal for the Site is to comply with residential criteria. Remediation will be performed to remove soil impacted with chemicals that exceed the Res DEC and GB PMC.

3. Laws and Regulations

The primary regulation for the remediation to comply with is Section 22a-133k-1 through -3, inclusive, of the RCSA. Additional applicable local, state and federal regulatory requirements will also be adhered to during the performance of the remediation.

V. Evaluation of Cleanup Alternatives

1. Cleanup Up Alternatives Considered

EPA requires that this ABCA includes the evaluation of three (3) remedial alternatives. To address the remediation of impacted soil at the Site, the following three (3) alternatives were considered, including:

- Alternative #1: No Action
- Alternative #2: Capping
- Alternative #3: Excavation/Off-Site Disposal

2. Cost Estimate of Cleanup Up Alternatives

To satisfy EPA requirements, the effectiveness, implementability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

Effectiveness

- Alternative #1: "No Action" is not effective in controlling or preventing the exposure of potential receptors to contamination at the Site.

- Alternative #2: Capping is effective in controlling the exposure of potential receptors to contamination at the Site. However, this alternative will not achieve remedial goals established for the Site if chemicals are left on-site at concentrations exceed residential criteria. In addition, this alternative requires filing an ELUR with the CT DEEP to restrict future site use to Industrial/Commercial purposes.

- Alternative #3: Excavation with off-site disposal of impacted soil followed by backfilling excavations with clean materials is effective in preventing the exposure of potential receptors to contamination at the Site and also meets remedial goals established for the Site.

Implementability

- Alternative #1: "No Action" is easy to implement, since no actions will be conducted.

- Alternative #2: Capping of impacted soil followed by backfilling excavations with clean materials is implementable but does not meet remedial goals established for the Site.

- Alternative #3: Excavation with off-site disposal of impacted soil followed by backfilling excavations with clean materials is implementable and also meets remedial goals established for the Site.

Cost

- Alternative #1: There are no costs associated with this alternative.

- Alternative #2: Capping is performed to minimize risk posed by impacted soil. This alternative involves removal of pavement and excavation to a depth of 27 inches. The site is then restored with 24 inches of clean backfill material and paved with a minimum of three inches of asphalt. Impacted soil beneath the 27-inch cap is rendered "inaccessible" as defined in the RSRs. However, to implement this option and then to redevelop the Site for Industrial/Commercial uses, the property will need to be entered into a Voluntary Remediation Program so that an ELUR can be filed. The approximate cost of implementing this alternative ranges from $371,000 - $474,000.

- Alternative #3 The approximate cost to perform excavation of impacted soil to the extent needed to comply with residential standards in the RSRs, backfilling the excavations with clean materials, and then restoring the surface with asphalt ranges from approximately $547,000 to $687,000.

3. Recommended Cleanup Up Alternatives

The recommended cleanup alternative is Alternative #3: Excavation/Off-Site Disposal. Alternative #1: No Action, cannot be recommended because it does not address Site risk and does not achieve remedial goals established for the Site. Alternative #2: Capping, while effective in limiting exposure to site receptors, is not considered to be feasible because it will not achieve residential criteria remedial goals established for the Site.

Additionally, Alternative #3 will utilize opportunities for achieving green remediation goals by using cleaner fuels, diesel emission controls, and/or other emission reduction practices for construction vehicles and other equipment in line with EPA's Clean and Green Cleanup guidelines.

Therefore, Alternative #3: Excavation/Off-Site Disposal is the most cost effective alternative capable of completely removing risk and most feasible option as this remedial option will make site redevelopment easier without the ELUR. In addition, Alternative #3 will utilize opportunities to implement and achieve green remediation goal in accordance with EPA's Clean and Green Cleanup Guidelines. For these reasons, the recommended cleanup alternative is Alternative #3: Excavation/Off-Site Disposal.

Attachment A

Summary of Climate Change Impacts to Connecticut

OMB Number: 4040-0004
Expiration Date: 12/31/2019

Application for Federal Assistance SF-424

* 1. Type of Submission:
- [ ] Preapplication
- [x] Application
- [ ] Changed/Corrected Application

* 2. Type of Application:
- [x] New
- [ ] Continuation
- [ ] Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received: 12/03/2019

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: Norwalk Redevelopment Agency

* b. Employer/Taxpayer Identification Number (EIN/TIN):

* c. Organizational DUNS: 7830964020000

d. Address:

* Street1: 1 Belden Avenue
Street2:
* City: Norwalk
County/Parish:
* State: CT: Connecticut
Province:
* Country: USA: UNITED STATES
* Zip / Postal Code: 06850-3303

e. Organizational Unit:

Department Name:

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:
* First Name: susan
Middle Name:
* Last Name: sweitzer
Suffix:

Title:

Organizational Affiliation:

* Telephone Number: 203 854 7810 x46791
Fax Number:

* Email: ssweitzer@norwalkct.org

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-19-07

* Title:

FY20 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment | Delete Attachment | View Attachment

*** 15. Descriptive Title of Applicant's Project:**

SoNo Railroad Station Remediation of Landfill Contaminants

Attach supporting documents as specified in agency instructions.

Add Attachments | Delete Attachments | View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: CT-4 | * b. Program/Project: CT-4

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment | Delete Attachment | View Attachment

17. Proposed Project:

* a. Start Date: 08/01/2020 | * b. End Date: 08/31/2022

18. Estimated Funding ($):

* a. Federal	500,000.00
* b. Applicant	100,000.00
* c. State	0.00
* d. Local	0.00
* e. Other	0.00
* f. Program Income	0.00
* g. TOTAL	600,000.00

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on .

☒ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☐ c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

☐ Yes ☒ No

If "Yes", provide explanation and attach

Add Attachment | Delete Attachment | View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: | * First Name: susan

Middle Name:

* Last Name: sweitzer

Suffix:

* Title: senior project manager

* Telephone Number: 203 854 77810 x46791 | Fax Number:

* Email: ssweitzer@norwalkct.org

* Signature of Authorized Representative: susan sweitzer | * Date Signed: 12/03/2019